

REMARKS

The Office action dated June 19, 2007, and the references cited have been fully considered. Please enter the following amendments, and consider the remarks presented herein. Reconsideration and/or further prosecution of the application is respectfully requested. No new matter is added herein.

Applicants do not present any amendments to the claims herein, but rather provide a clean set of claims (without diff markings) for the file.

All claims stand rejected under 35 USC § 103(a) as being obvious over the combination of Butehorn et al., US Patent Application Publication No. 2004/0132451 A1 in view of Basturk et al., US Patent 6,938,095 B2.

Applicants appreciate the examination of the application. However, Applicants respectfully traverse all claim rejections as their combination neither teaches nor suggests all claim limitations of any pending claim.

First, all claims recite limitations limiting the scope of the claims to distributing routing information in a single device (i.e., the clients are within the device) - such as described throughout the specification, including, for example, page 10, line 8 (routing information is distributed within a router or other device). The Office relies on Butehorn et al. for the teachings of all limitation in a claim except that the distribution of routing information is performed with a single device. Applicants agree with the Office's statement on page 4 of the Office action that "Butehorn does not explicitly teach distributing routing information within a router, wherein the client is within the router." The Office then relies on Basturk et al., US Patent 6,938,095 B2 as it teaches distributing routing information within a router.

Albeit Basturk et al. does teach distributing routing information within a router, it fails to provide a modification to Butehorn et al. that the terminals and route server relied upon for the other limitations are within a single device, such as in the router of Basturk et al. Therefore, the combination as presented in the Office action fails to present a *prima facie* case of obviousness. In fact, putting the terminals and route server in a same device would render Basturk et al. unfit

for its intended purpose of communicating among mobile devices - i.e., devices not within a single router. Therefore, such a rejection contradicts MPEP § 2143.01(V) and *In re Gordon*, 221 USPQ 1125 (Fed. Cir. 1984). As all claims rely on this combination, all claims are believed to be allowable over the prior art of record. Moreover, Assuming the Office performed its duty as required by MPEP § 706 and 37 CFR 1.104(c)(2) and cited the best art available, then all claims are allowable over the best prior art available.

For at least these reasons, all claims are believed to be allowable. Additionally, Applicants respectfully traverse the rejections of all claims as the Office action fails to specifically provide teachings for each and every limitation. For example, the claims refer to "route updates" and "types of route changes" (e.g., as listed on page 17, lines 11-14 of the original specification: notify on change in route, notify on change or reachability information, notify on change of nexthop address or interface, notify on change of hop distance, etc.) where the Office action refers to "routing information" of Butehorn et al. Applicants make a demand for evidence that Butehorn et al. teaches that its routing information includes both "route updates" and "types of route changes". Additionally, for example, the notification of the client is triggered *in response to* the route update matching the registered address and routing attribute (as recited in corresponding language in the independent claims); however, the Office cites the external trigger of paragraph 0014 which neither teaches nor suggests such a determination ("in response to") is made. Finally, the rejections must cohere and comply with the antecedent basis presented in each claim. The Office rejects the claims by selecting diverse statements in the references and therefore they do not refer to the same data as would be required for a proper rejection. These comments apply to all the claims.


For at least the reason that each claim affirmatively recites that the routing information is distributed within a single router or other apparatus, all claims are believed to be allowable as this is neither taught nor suggested by the prior art of record.

In re LIN ET AL., Application No. 10/733,016
Amendment D

In view of the above remarks and for at least the reasons presented herein, all pending claims are believed to be allowable over the prior art of record, the application is considered in good and proper form for allowance, and the Office is respectfully requested to issue a timely Notice of allowance in this case. If, in the opinion of the Office, a telephone conference would expedite the prosecution of the subject application, the Office is invited to call the undersigned attorney.

Applicant believes a two-month extension of time is required, and hereby petitions any extension of time required and has included herewith a credit card payment form (PTO-2038) for payment of the extension fee, and Applicant's representative hereby authorizes the Commissioner to charge/credit any additional associated fees to Deposit Account No. 501430.

Date: November 19, 2007

Respectfully submitted,
The Law Office of Kirk D. Williams
By 
Kirk D. Williams, Reg. No. 42,229
One of the Attorneys for Applicants
CUSTOMER NUMBER 26327
The Law Office of Kirk D. Williams
1234 S. OGDEN ST., Denver, CO 80210
303-282-0151 (telephone), 303-778-0748 (facsimile)